

EXHIBIT A



U.S. Department of Justice

Criminal Division

Fraud Section

Meredith Ruggles

Assistant United States Attorney

101 South Edgeworth Street, Suite 400

Greensboro, North Carolina 27401

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April 7, 2021

Elliot Abrams, Esq.
Cheshire Parker Schneider, PLLC
133 Fayetteville Street, Suite 200
Raleigh, North Carolina 27602
(919) 833-3114
elliot.abrams@cheshirepark.com

Re: *United States v. Reifler*, 1:20-cr-512-1

Dear Mr. Abrams:

Pursuant to this Court's Local Rules, please find enclosed three pieces of media (Productions 1.1, 1.2 and 1.3), along with an Index and Addendum enclosed at Attachments A and B, describing the various materials contained on the media. The enclosed media is encrypted, and the passwords will be provided to you via email.

- Written and Recorded Statements of the Defendant, Rule 16(a)(1)(A)-(B). Some statements of the defendants are contained on the enclosed hard drives. Any additional statements will be contained in later productions.
- Prior Criminal Record, Rule 16(a)(1)(D). The enclosed materials contain the defendant's NCIC criminal records.
- Documents and Tangible Objects, Rule 16(a)(1)(E). The enclosed materials contain documents and tangible objects. We will make available for your inspection any other documents and tangible objects that are within the Government's possession, custody, or control and which are (1) material to the preparation of the defense; (2) intended for use by the Government as evidence in its case-in-chief at trial; or (3) obtained from or belonging to your client.

In addition, in April 2018, counsel for the defendant produced to the Government certain electronic devices, including a server for the Forefront offices, images of several computers, and email and iCloud data for various individuals, among other things (hereinafter, the “Forefront Devices”). The Government notes that it was unable to access the contents of select items within the Forefront Devices, including an iOmega NAS device and devices described as Haystack images of computers for Alisa Rusanoff and custodian Wendy Espinoza. In August 2020, counsel for the defendant informed the Government that it did not have the password necessary to access the iOmega NAS drive. In addition, counsel for the defendant did not respond to the Government’s August and September 2020 requests for assistance accessing the Haystack images of computers for Ms. Rusanoff and Ms. Espinoza. As a result, the Government cannot access these devices, and their contents are not included in the enclosed media. The Government will make these and any other of the Forefront Devices available for inspection at the request of defense counsel.

- Specific Examinations and Reports, Rule 16(a)(1)(F). No examinations and tests have been completed to date. If and when any such tests are completed, the Government will comply with the disclosures required under Fed. R. Crim. P. 16(a)(1)(F).
- Expert Witnesses, Rule 16(a)(1)(G). If necessary, the United States will retain expert witnesses in connection with trial in this matter. We will provide you with a summary of the expert’s testimony in accordance with Fed. R. Crim. P. 16(a)(1)(G) prior to trial.
- Title 18, United States Code, Section 3500. The United States reserves the right to follow the procedures set forth in Title 18, United States Code, Section 3500 with respect to any Government witness.
- Brady/Giglio Material. The Government is aware of its obligations under *Brady* and *Giglio* and will furnish any such material at such a time as to permit its appropriate use by the defense. You may find that the enclosed materials contain *Brady* or *Giglio* material. We have not attempted to characterize any such material in that fashion.
- Reciprocal Discovery, Rule 16(b). Please accept this letter as a request under Fed. R. Crim. P. 16(b) for all materials discoverable by the Government under that Rule.

The attached index provides further detail on this Discovery production, to include a description of the documents in each subset; the “Beg Doc” and “End Doc” corresponding to the Bates numbers for that subset; and the media on which these records are produced.

Along with the Index, a majority of the material has been provided to you in a load-ready, searchable format. We have also provided you with the following metadata fields to assist you in locating and reviewing the discovery produced in this case: Production BEGDOC; Production ENDDOC; Production BEGATT; Production ENDATT; Custodian; Doc Author; Doc Date

Created; Doc Date Last Modified; Doc Date Last Print; Doc Ext; Doc Subject; Doc Time Created; Doc Time Last Modified; Doc Title; Doc Type; Email BCC; Email CC; Email Conversation; Email Date Sent; Email EntryID; Email Folder; Email From; Email INTMSGID; Email Subject; Email Time Sent; Email To; File Path; Filename; MD5 Hash; Page Count; Password Protected; Placeholder; SHA1 Hash; Source; Batch Sort; Text Precedence; and FILE_PATH. The documents at Bates numbers DOJ-PROD-0001930165 - DOJ-PROD-0001933996 and DOJ-PROD-0001959698 - DOJ-PROD-0001960412 have been provided in native format. We will continue our efforts to produce these documents in a load-ready format and, if they can be prepared in a load-ready format, re-produce them accordingly.

The prosecution team in this case has relied upon a filter protocol and filter team within the Fraud Section to segregate and screen documents potentially subject to claims of privilege or other protection (“Potentially Privileged Material”). The Filter attorney in this case is assigned to the U.S. Department of Justice, Criminal Division, Fraud Section’s Special Matters Unit. The Filter Team attorney has a separate reporting and supervisory chain from the Prosecution Team in this case and is supported by paralegals and other professional staff who are not part of the Prosecution Team. We understand that the Filter Attorney will contact defense counsel regarding materials that, to date, have been withheld from the prosecution team and that are not included in the enclosed production. The Filter Attorney will be handling any and all discovery of Potentially Privileged Material.

The Government recognizes its ongoing obligation to supplement these disclosures if new material becomes available or changing circumstances warrant additional disclosures. The Government continues to review its files for discoverable information and materials. To the extent that any additional discoverable information and materials are located, the Government will produce them to you pursuant to its obligations. Should you have any questions or need additional information, please do not hesitate to contact Tom Tynan at (202) 768-1136.

Sincerely,

MATTHEW G.T. MARTIN
United States Attorney

By: /s/
Meredith Ruggles
Assistant United States Attorney
Middle District of North Carolina

DANIEL S. KAHN
Acting Chief, Fraud Section

By: /s/
Thomas Tynan
Trial Attorney
Criminal Division, Fraud Section
United States Department of Justice

Encl. Attachment A: US v. Reifler Government Production 1 Index

Encl. Attachment B: US v. Reifler Discover Addendum 1

Producing Party	Description	Production BEGDOC	Production ENDDOC	Production No.	Production Date
American Express	Subpoena production for bank records for accounts x2006 and x4002, in the name of Forefront Capital.	DOJ-PROD-0000000001	DOJ-PROD-0000000572	1	4/5/2021
Andrew Wasitowski	Subpoena production for documents and correspondence pertaining to Auto Funding Solutions, the Forefront entities, and FF Sully Partners.	DOJ-PROD-0000000573	DOJ-PROD-0000000761	1	4/5/2021
Bank of America	Subpoena production for bank accounts x5083 and x0556 in the name of Waterbridge Capital, LLC, Spring Street 182, LLC, and Syracuse Property Holdings, LLC.	DOJ-PROD-0000000762	DOJ-PROD-0000001058	1	4/5/2021
Bank of America	Subpoena production for bank accounts x5083, x0556, and x2082, in the name of Joel Schreiber.	DOJ-PROD-0000001059	DOJ-PROD-0000001561	1	4/5/2021
Bank of America	Subpoena production for bank account x9329, in the name of Bradley Reifler.	DOJ-PROD-0000001562	DOJ-PROD-0000001651	1	4/5/2021
Bank of America	Subpoena production for bank accounts x9238, x8982, x8979, x8966, x9156, x8868, x8855, x0414, x1344, x8995, x9004, and x9166, in the name of Cole Capital Ventures, Forefront Capital Services, Forefront Partners, Forefront Partners St Notes, Forefront United, Insurance Marketplace Agency, Irene Tech, John M Itold, Newbeg, Port Royal NCM, and Women at the Forefront.	DOJ-PROD-0000001652	DOJ-PROD-0000006398	1	4/5/2021
Bank of America	Subpoena production for bank accounts x5976, x5183, x5196, x0874, and x5992 in the name of Dealdefenders LLC.	DOJ-PROD-0000006399	DOJ-PROD-0000009293	1	4/5/2021
Bank of America	Subpoena production for bank accounts x8979 and x8982, in the name of Forefront Partners, and Forefront Capital Services.	DOJ-PROD-0000009294	DOJ-PROD-0000009389	1	4/5/2021
Bank of America	Subpoena production for bank account x5083, in the name of Waterbridge Capital LLC.	DOJ-PROD-0000009390	DOJ-PROD-0000009582	1	4/5/2021
Citizens Bank	Subpoena production for bank accounts x8301, x5932, and x4644, in the name of Summit Trust Company.	DOJ-PROD-0000009583	DOJ-PROD-0000010711	1	4/5/2021
Citizens Bank	Subpoena production for bank account x8301, in the name of Summit Trust Company.	DOJ-PROD-0000010712	DOJ-PROD-0000010891	1	4/5/2021
Citibank	Subpoena production for bank account x6033, in the name of KelCop LP and/or KelCop Family, LLC.	DOJ-PROD-0000010892	DOJ-PROD-0000011153	1	4/5/2021
Citibank	Subpoena production for bank accounts x2632 and x3337, in the name of Francisco Javier Sumavieille.	DOJ-PROD-0000011154	DOJ-PROD-0000011172	1	4/5/2021
Citibank	Subpoena production for bank accounts x6204 and x4042, in the name of Francisco Javier Sumavieille.	DOJ-PROD-0000011173	DOJ-PROD-0000011888	1	4/5/2021
Citibank	Subpoena production for bank accounts x1356, x3078, x3647, x7693, x4514, x4522, x6033, x6041, x9058, and x3647, in the name of Pali Capital, Forefront Capital Management, Bradley Reifler, KelCop, and ForeFront Capital Holdings.	DOJ-PROD-0000011889	DOJ-PROD-0000012523	1	4/5/2021
Yvonne Ditzel	Subpoena production of email communications regarding, among other things, Forefront and related entities, Summit Trust Company, and North Carolina Mutual Life Insurance Company.	DOJ-PROD-0000012524	DOJ-PROD-0000016458	1	4/5/2021
Forefront Capital Holdings	Subpoena production for documents pertaining to Auto Funding Group.	DOJ-PROD-0000016459 DOJ-PROD-0000172569	DOJ-PROD-0000017242 DOJ-PROD-0000173497	1	4/5/2021
First National Bank of Omaha	Subpoena production for bank accounts x3239 and x3242, in the name of Forefront Income Trust.	DOJ-PROD-0000017243	DOJ-PROD-0000017327	1	4/5/2021
First Republic Bank	Subpoena production for bank accounts x2075, x4623, x4792, x4958, x5161, x5278, x5310, x5401, x5542, x5658, x5708, x5914, x6227, and x6433, in the name of Bradley Reifler, Forefront Capital Markets, FF Sully Partners, Talking Capital, BRSG Capital, Forefront Capital Advisors, Talking Capital Partners I, Forefront Talking Capital Investment, Talking Capital Partners II, Talking Capital Partners III, and Talking Capital Partners IV.	DOJ-PROD-0000017328	DOJ-PROD-0000019116	1	4/5/2021
First Republic Bank	Subpoena production for bank accounts x4792 and x5401, in the name of FF Sully LP.	DOJ-PROD-0000019117	DOJ-PROD-0000019288	1	4/5/2021
First Republic Bank	Subpoena production for bank accounts x2075, x4623, x4792, x4958, x5161, x5278, x5310, x5401, x5542, x5658, x5708, x5914, x6227, and x6433, in the name of Bradley Reifler, Forefront Capital Markets, FF Sully Partners, Talking Capital, BRSG Capital, Forefront Capital Advisors, Talking Capital Partners I, Forefront Talking Capital Investment, Talking Capital Partners II, Talking Capital Partners IV, and Talking Capital Partners III.	DOJ-PROD-0000019289	DOJ-PROD-0000020389	1	4/5/2021
Iryna Stepanchuk	Subpoena production of accounting records related to Bradley Reifler.	DOJ-PROD-0000020390	DOJ-PROD-0000032434	1	4/5/2021
Steven Fickes	Voluntary production related to the Reinsurance Trust Agreement and Investment Advisory Agreement.	DOJ-PROD-0000032435	DOJ-PROD-0000032439	1	4/5/2021
Joel Schreiber	Subpoena production of documents related to Forefront and related entities and correspondence with Bradley Reifler and other Forefront employees.	DOJ-PROD-0000032440	DOJ-PROD-0000048048	1	4/5/2021

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Producing Party	Description	Production BEGDOC	Production ENDDOC	Production No.	Production Date
Signature Bank	Subpoena production for bank account x1106, in the name of FYM Millbrook.	DOJ-PROD-0000048049	DOJ-PROD-0000048325	1	4/5/2021
Sprintship	Subpoena production for documents related to Forefront and related entities	DOJ-PROD-0000048326	DOJ-PROD-0000048493	1	4/5/2021
SunTrust Bank	Subpoena production for bank accounts x7380 and x7455, in the name of Port Royal.	DOJ-PROD-0000048494	DOJ-PROD-0000048619	1	4/5/2021
SunTrust Bank	Subpoena production for bank account x7380, in the name of Port Royal.	DOJ-PROD-0000048620	DOJ-PROD-0000048624	1	4/5/2021
SunTrust Bank	Subpoena production for bank accounts x0427, x0757, x3982, x4535, and x7217, in the name of Auto Funding Solutions.	DOJ-PROD-0000048625	DOJ-PROD-0000057147	1	4/5/2021
SunTrust Bank	Subpoena production for bank accounts x3982 and x0757, in the name of Auto Funding Solutions and Auto Funding Group,	DOJ-PROD-0000057148	DOJ-PROD-0000057159	1	4/5/2021
UBS	Subpoena production for Bank accounts x1726, x1727, x6721, and x7511, in the name of Waterbridge Capital, LLC, Spring Street 182, LLC, and Syracuse Property Holdings, LLC.	DOJ-PROD-0000057160	DOJ-PROD-0000057450	1	4/5/2021
Valley National Bank	Subpoena production for bank accounts x0344 and x0298, in the name of Waterbridge Capital.	DOJ-PROD-0000057451	DOJ-PROD-0000057931	1	4/5/2021
Wells Fargo	Subpoena production for bank accounts x2450, x0378, x1195, x1493, and x6138, in the name of Summit Trust Company.	DOJ-PROD-0000057932	DOJ-PROD-0000058900	1	4/5/2021
Wells Fargo	Subpoena production for bank account x7190, in the name of Katie Birdsall.	DOJ-PROD-0000058901	DOJ-PROD-0000058904	1	4/5/2021
Angel Santos	Voluntary production of records from iPhone belonging to Angel Santos.	DOJ-PROD-0000058905	DOJ-PROD-0000112643	1	4/5/2021
North Carolina Mutual	Voluntary production from North Carolina Mutual consisting of business records and correspondence.	DOJ-PROD-0000112644	DOJ-PROD-0000169158	1	4/5/2021
North Carolina Mutual	Voluntary production of documents supporting declaration of Gregory M. Cancilla submitted by North Carolina Mutual Life Insurance Company in <i>In re: Bradley C. Reifler</i> .	DOJ-PROD-0000169159	DOJ-PROD-0000172552	1	4/5/2021
SEC	Documents related to Joel Schreiber and Waterbridge produced pursuant to access request.	DOJ-PROD-0000172553 DOJ-PROD-0000647879	DOJ-PROD-0000172553 DOJ-PROD-0000648105	1	4/5/2021
NC Dept of Insurance	Subpoena production for documents related to the Reinsurance Trust Agreement involving North Carolina Mutual Life Insurance Company, Port Royal Reassurance Trust Company, and Forefront Capital Holdings.	DOJ-PROD-0000173498	DOJ-PROD-0000195443	1	4/5/2021
JP Morgan	Subpoena production for bank accounts x5809 and x0417, in the name of Bradley Reifler, Forefront Capital, Forefront Income Trust, and Forefront Talking Capital.	DOJ-PROD-0000195444	DOJ-PROD-0000195448	1	4/5/2021
SEC	Testimony transcripts and associated exhibits for depositions of Bradley Reifler and David Wasitowski produced pursuant to access request.	DOJ-PROD-0000195449	DOJ-PROD-0000196790	1	4/5/2021
SEC	Testimony transcript and associated exhibits for deposition of Michael Flatley produced pursuant to access request.	DOJ-PROD-0000196791	DOJ-PROD-0000196878	1	4/5/2021
SEC	Production from Brook Weiner produced pursuant to access request.	DOJ-PROD-0000196879	DOJ-PROD-0000216091	1	4/5/2021
SEC	Testimony transcripts and associated exhibits for deposition of Bradley Reifler produced pursuant to access request.	DOJ-PROD-0000216092	DOJ-PROD-0000216346	1	4/5/2021
SEC	Documents pertaining to Forefront Capital Management and deposition exhibits pursuant to access request.	DOJ-PROD-0000216347	DOJ-PROD-0000216796	1	4/5/2021
SEC	Documents related to Forefront Partners produced pursuant to an access request.	DOJ-PROD-0000216797	DOJ-PROD-0000618671	1	4/5/2021
SEC	Documents pertaining to Summit Trust Company produced pursuant to access request.	DOJ-PROD-0000618672	DOJ-PROD-0000647878	1	4/5/2021
Symmetry Development	Subpoena production of documents related to Forefront and related entities, correspondence with Bradley Reifler and other Forefront employees.	DOJ-PROD-0000648106	DOJ-PROD-0000668188	1	4/5/2021
JP Morgan	Subpoena production for bank accounts x0417, x0454, x2801, x2897, x3465, x3601, x3932, x5065, x5809, x6698, x7066, and x7223, in the name of Waterbridge Capital, LLC, Spring Street 182, LLC, Syracuse Property Holdings, LLC.	DOJ-PROD-0000670743	DOJ-PROD-0000677519	2	4/5/2021
American Express	Subpoena production for bank accounts x8003, x9001, x1008, x1009, x1000, x2008, and x4009, in the name of Angel Santos.	DOJ-PROD-0000668189	DOJ-PROD-0000669854	2	4/5/2021
Bank of America	Subpoena production for bank accounts x0874, x5976, and x5992, in the name of Dealdefenders LLC.	DOJ-PROD-0000669855	DOJ-PROD-0000670742	2	4/5/2021

Producing Party	Description	Production BEGDOC	Production ENDDOC	Production No.	Production Date
JP Morgan	Subpoena production for bank account x3266, in the name of Port Royal.	DOJ-PROD-0000677520	DOJ-PROD-0000677572	2	4/5/2021
North Carolina Mutual	Subpoena production for deposition exhibits from the bankruptcy proceeding.	DOJ-PROD-0000677573	DOJ-PROD-0000678354	2	4/5/2021
Signature Bank	Subpoena production for bank account x1106, in the name of FYM Millbrook.	DOJ-PROD-0000678355	DOJ-PROD-0000679249	2	4/5/2021
Union Bank	Subpoena production for bank account x6800, in the name of Forefront Income Trust.	DOJ-PROD-0000679250	DOJ-PROD-0000679827	2	4/5/2021
Union Bank	Subpoena production for bank accounts x6800 and x6805, in the name of Forefront Income Trust.	DOJ-PROD-0000679828	DOJ-PROD-0000680382	2	4/5/2021
Wedbush	Subpoena production for bank account x0060, in the name of Bradley Reifler.	DOJ-PROD-0000680383	DOJ-PROD-0000680519	2	4/5/2021
FDIC	Proof of the insured status of Bank of America and U.S. Bank National Association	DOJ-PROD-0000680520	DOJ-PROD-0000680546	2	4/5/2021
North Carolina Mutual	Subpoena production for documents and records pertaining to losses incurred by North Carolina Mutual Life Insurance.	DOJ-PROD-0000680547	DOJ-PROD-0000685200	2	4/5/2021
US Bank	Subpoena production for bank account x7303, in the name of Port Royal Reinsurance Company.	DOJ-PROD-0000685201	DOJ-PROD-0000685349	2	4/5/2021
CBP	Customs and Border Protection Investigative Report.	DOJ-PROD-0000685350	DOJ-PROD-0000685352	2	4/5/2021
NC Dept of Insurance	Voluntary production of North Carolina Mutual Report on Examination.	DOJ-PROD-0000685353	DOJ-PROD-0000685383	2	4/5/2021
Forefront	Records recovered from devices produced by Forefront Capital Holdings and related entities.	DOJ-PROD-0000685583	DOJ-PROD-0001924930	2	4/5/2021
JP Morgan	Subpoena production for bank accounts x0417, x0672, x2387, x2770, x2801, x3266, x3601, x4401, x5809, x6698, x7066, x7074, x7082, x7090, x7139, x7147, x7155, x7163, x7223, x8185, x9265, and x9313, in the name of Forefront Partners, Forefront Capital Services, Bradley Reifler, Ackerman Irr Trust FBO Kelsey Reifler, Forefront Capital Management, Forefront Capital Markets, Forefront Partners Short Term Notes, Forefront Wealth Management, and Kelsey Reifler Mintor UTMA.	DOJ-PROD-0001924931	DOJ-PROD-0001929128	2	4/5/2021
North Carolina Mutual	Voluntary production of records related to the Reinsurance Trust Agreement between North Carolina Mutual Life Insurance and Port Royal Reassurance Company.	DOJ-PROD-0001929129 DOJ-PROD-0000685384	DOJ-PROD-0001929149 DOJ-PROD-0000685582	2	4/5/2021
SEC	Documents pertaining to Symmetry Property Development produced pursuant to access request.	DOJ-PROD-0001929150	DOJ-PROD-0001929383	2	4/5/2021
SEC	General ledger analysis of Forefront Partners and Forefront Capital Services cash account produced pursuant to access request.	DOJ-PROD-0001929384	DOJ-PROD-0001929391	2	4/5/2021
SEC	Documents pertaining to Michael Flatley produced pursuant to access request.	DOJ-PROD-0001929392	DOJ-PROD-0001929784	2	4/5/2021
SEC	Documents pertaining to David Wasitowski produced pursuant to access request.	DOJ-PROD-0001929785	DOJ-PROD-0001930120	2	4/5/2021
Symmetry Development	Subpoena production of documents related to Forefront and related entities, correspondence with Bradley Reifler and other Forefront employees, and audio files from Symmetry Property Development with draft transcripts of the produced recordings created by the Department of Justice.	DOJ-PROD-0001930121	DOJ-PROD-0001930164	2	4/5/2021
American Express	Subpoena production for bank records for accounts x4009, x1008, x1009, x2008, in the name of Angel Santos.	DOJ-PROD-0001930165	DOJ-PROD-0001930460	3	4/5/2021
Bachner and Weiner	Production regarding <i>Forefront Income Trust v. Joel Schreiber et al.</i>	DOJ-PROD-0001930461	DOJ-PROD-0001930530	3	4/5/2021
Forefront	Voluntary production from Forefront of the bankruptcy depositions.	DOJ-PROD-0001930531	DOJ-PROD-0001931972	3	4/5/2021
Forefront	Voluntary production from Forefront relating to the devices produced to the government	DOJ-PROD-0001931973	DOJ-PROD-0001931973	3	4/5/2021

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Producing Party	Description	Production BEGDOC	Production ENDDOC	Production No.	Production Date
NCIC	Bradley Reifler National Crime Information Center Report.	DOJ-PROD-0001931974	DOJ-PROD-0001931974	3	4/5/2021
SEC	Testimony transcripts and associated exhibits for deposition of Steve Fickes.	DOJ-PROD-0001931975	DOJ-PROD-0001932462	3	4/5/2021
SEC	Documents pertaining to Meade Rudasill and Summit Trust Company produced pursuant to access request.	DOJ-PROD-0001932463	DOJ-PROD-0001932647	3	4/5/2021
SEC	Testimony transcripts of depositions of Bradley Reifler produced pursuant to access request.	DOJ-PROD-0001932648	DOJ-PROD-0001932905	3	4/5/2021
SEC	Documents pertaining to Symmetry Property Development produced pursuant to access request.	DOJ-PROD-0001932906	DOJ-PROD-0001933143	3	4/5/2021
SEC	Documents pertaining to Frank Argenziano produced pursuant to access request.	DOJ-PROD-0001933144	DOJ-PROD-0001933262	3	4/5/2021
SEC	Documents pertaining to Margaret Leszcynska produced pursuant to access request.	DOJ-PROD-0001933263	DOJ-PROD-0001933996	3	4/5/2021
SEC	Documents the SEC received from Union Bank in response to its subpoena for SEC v. Bradley Reifler et al.	DOJ-PROD-0001933997	DOJ-PROD-0001935105	4	4/5/2021
SEC	Defendants' production received with regard to SEC v. Bradley Reifler, et al.	DOJ-PROD-0001935106	DOJ-PROD-0001956528	4	4/5/2021
SEC	Defendants' production received with regard to SEC v. Bradley Reifler, et al.	DOJ-PROD-0001956529	DOJ-PROD-0001959697	4	4/5/2021
DOJ	Interview with Michael Lawrence on 8/24/2017	DOJ-PROD-0001959698	DOJ-PROD-0001959703	5	4/5/2021
DOJ	Interview with Jacqueline Obusek, Susan Coble, and Jeffrey Trendel on 8/24/2017	DOJ-PROD-0001959704	DOJ-PROD-0001959706	5	4/5/2021
DOJ	Interview with Jeffrey Layton on 6/12/2018	DOJ-PROD-0001959707	DOJ-PROD-0001959761	5	4/5/2021
DOJ	Interview with Joel Schreiber on 9/27/2017	DOJ-PROD-0001959762	DOJ-PROD-0001959762	5	4/5/2021
DOJ	Interview with Meade Rudasill on 3/21/2019	DOJ-PROD-0001959763	DOJ-PROD-0001959775	5	4/5/2021
DOJ	Interview with Margaret Leszcynska on 2/14/2018	DOJ-PROD-0001959776	DOJ-PROD-0001960130	5	4/5/2021
DOJ	Interview with Vonnie Ditzel on 2/13/2018	DOJ-PROD-0001960131	DOJ-PROD-0001960167	5	4/5/2021
DOJ	Interview with Angel Santos on 3/8/2018	DOJ-PROD-0001960168	DOJ-PROD-0001960170	5	4/5/2021
DOJ	Interview with Andrew Wasitowski on 7/2/2018	DOJ-PROD-0001960171	DOJ-PROD-0001960172	5	4/5/2021
DOJ	Interview with Andrew Wasitowski on 7/31/2018	DOJ-PROD-0001960173	DOJ-PROD-0001960174	5	4/5/2021
DOJ	Interview with Jason Ding on 6/12/2018	DOJ-PROD-0001960175	DOJ-PROD-0001960178	5	4/5/2021
DOJ	Interview with Andrew Whiteside on 7/25/2018	DOJ-PROD-0001960179	DOJ-PROD-0001960180	5	4/5/2021
DOJ	Interview with Andrew Whiteside on 10/19/2018	DOJ-PROD-0001960181	DOJ-PROD-0001960184	5	4/5/2021
DOJ	Interview with Francie Whiteside on 10/19/2018	DOJ-PROD-0001960185	DOJ-PROD-0001960186	5	4/5/2021
DOJ	Interview with Javier Sumaville on 8/6/2018	DOJ-PROD-0001960187	DOJ-PROD-0001960188	5	4/5/2021
DOJ	Interview with Joel Schreiber on 11/26/2018	DOJ-PROD-0001960189	DOJ-PROD-0001960196	5	4/5/2021
DOJ	Interview with Michael Flatley on 2/1/2019	DOJ-PROD-0001960197	DOJ-PROD-0001960213	5	4/5/2021
DOJ	Interview with Margaret Leszcynska on 6/21/2019	DOJ-PROD-0001960214	DOJ-PROD-0001960229	5	4/5/2021
DOJ	Interview with Frank Argenziano on 12/18/2018	DOJ-PROD-0001960230	DOJ-PROD-0001960235	5	4/5/2021
DOJ	Interview with Jackie Britt on 2/12/2020	DOJ-PROD-0001960236	DOJ-PROD-0001960281	5	4/5/2021
DOJ	Interview with James Speed on 2/11/2020	DOJ-PROD-0001960282	DOJ-PROD-0001960315	5	4/5/2021
DOJ	Interview with Charles Hobgood on 2/12/2020	DOJ-PROD-0001960316	DOJ-PROD-0001960322	5	4/5/2021
DOJ	Interview with Andrew Stone on 4/10/2019	DOJ-PROD-0001960323	DOJ-PROD-0001960332	5	4/5/2021
DOJ	Application for Search Warrant and Warrants for 123 Fraleigh Hill Rd and 641 Lexington Ave	DOJ-PROD-0001960332	DOJ-PROD-0001960400	6	4/5/2021
SEC	Union bank documents pertaining to Forefront entities.	DOJ-PROD-0001960401	DOJ-PROD-0001960408	6	4/5/2021
SEC	Documents pertaining to Forefront entities.	DOJ-PROD-0001960409	DOJ-PROD-0001960412	6	4/5/2021



U.S. Department of Justice

Criminal Division

Fraud Section

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ADDENDUM 1

Dated: April 7, 2021

The 39 items identified below were flagged as containing a virus. The text file and image placeholders for these records remain available. The infected native files have been removed from the Production.

PRODUCTION 1.2 – INFECTED NATIVE FILES BEGDOC	
DOJ-PROD-0000874238	DOJ-PROD-0001533992
DOJ-PROD-0000878970	DOJ-PROD-0001535042
DOJ-PROD-0000883306	DOJ-PROD-0001572487
DOJ-PROD-0000933698	DOJ-PROD-0001575743
DOJ-PROD-0001046355	DOJ-PROD-0001576642
DOJ-PROD-0001073792	DOJ-PROD-0001662513
DOJ-PROD-0001077603	DOJ-PROD-0001678501
DOJ-PROD-0001092623	DOJ-PROD-0001678700
DOJ-PROD-0001096474	DOJ-PROD-0001684709
DOJ-PROD-0001097548	DOJ-PROD-0001685222
DOJ-PROD-0001271056	DOJ-PROD-0001710808
DOJ-PROD-0001271121	DOJ-PROD-0001711064
DOJ-PROD-0001273037	DOJ-PROD-0001711067
DOJ-PROD-0001308165	DOJ-PROD-0001711646
DOJ-PROD-0001366383	DOJ-PROD-0001711897
DOJ-PROD-0001402893	DOJ-PROD-0001713765
DOJ-PROD-0001415726	DOJ-PROD-0001714322
DOJ-PROD-0001478145	DOJ-PROD-0001714366
DOJ-PROD-0001501364	DOJ-PROD-0001810654
DOJ-PROD-0001515720	